

MITCHELL S. BISSON, ESQ.
Nevada Bar No. 11920
LAW OFFICES OF MITCHELL S. BISSON
911 N. Buffalo Dr., Ste. 201
Las Vegas, NV 89128
Tel No.: (702) 602-4990
Email: MBisson@BissonLegal.com
Attorney for Plaintiff Xiaoye Bai

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

XIAOYE BAI,

Plaintiff,

v.

REUBART, et. al.,

Defendants.

Case No: 2:19-cv-00739-GMN-NJK

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND
TO MOTION FOR SUMMARY JUDGMENT
(First Request)**

Plaintiff XIAOYE BAI, by and through his counsel of record, Mitchell S. Bisson, Esq. of the Law Offices of Mitchell S. Bisson, and Defendants Dan Clark, David Halsey, Dana Howry and William Reubart ("Defendants"), by and through their counsel of record, Christopher M. Guy, Esq. of the Office of the Attorney General, submits this Stipulation and Order to Extend Time to Respond to Defendants' Motion for Summary Judgment [Document 91].

Defendants filed their Motion for Summary Judgment [Document 91] on December 13, 2021. Currently, the deadline to respond to Plaintiffs' Motion for Summary Judgment is January 3, 2022.

On December 22, 2021, Mitchell S. Bisson, Esq. filed a Notice of Appearance of Counsel by Plaintiff Xiaoye Bai [Document 97]. Prior to Mr. Bisson representing Plaintiff, Plaintiff was proceeding in forma pauperis. Mr. Bisson has represented that new potential settlement discussions should take place amongst the parties with Plaintiff now being represented by counsel with Mr. Bisson being given additional time to be acquainted with the facts and party positions in this matter.

Given these considerations, the parties agree that it is appropriate to extend the time for Plaintiff to respond to Defendants' Motion for Summary Judgment [Doc. 91].

Accordingly, the parties respectfully request that the time for Plaintiff to respond to Defendants' Motion for Summary Judgment [Doc. 91] be extended for 45 days beyond the current due date, until approximately February 17, 2022. The parties further request that the time for Defendants to file a Reply be extended appropriately as well.

This extension request is made in good faith, jointly by the parties, and not for the purposes of delay.

IT IS SO STIPULATED this 27th day of December, 2021.

LAW OFFICES OF
MITCHELL S. BISSON

/s/ Mitchell S. Bisson
MITCHELL S. BISSON, ESQ.
Nevada Bar No. 11920
911 N. Buffalo Dr., Ste. 201
Las Vegas, NV 89128
Attorney for Plaintiff

OFFICE OF THE ATTORNEY GENERAL
Deputy Attorney General

/s/ Christopher M. Guy
Christopher M. Guy, Esq.
Nevada Bar No. 15239
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
Attorney for Defendants

ORDER

Having considered the foregoing, and it appearing to the satisfaction of the Court and for good cause appearing:

IT IS HEREBY ORDERED that the due date to respond to Plaintiff's Motion for Summary Judgment be extended to the 17th day of February, 2022.

IT IS FURTHER ORDERED that the due date for Defendants to file a Reply be extended to the 24th day of February, 2022.

IT IS SO ORDERED.

Submitted by:

/s/ Mitchell S. Bisson
MITCHELL S. BISSON, ESQ.
Nevada Bar No. 11920
Law Offices of Mitchell S. Bisson

IT IS SO ORDERED.

Dated this 28 day of December, 2021

Fwd: Bai v. Reubart, et al.- USDC 2:19-cv-00739-GMN-NJK

Mitchell Bisson <mbisson@bissonlegal.com>

Mon 12/27/2021 4:27 PM

To: Matthew Hughes <hughes@bissonlegal.com>

 1 attachments (288 KB)

20211224 Stipulation and Order Extending Time to Respond.pdf;

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From: Sheri L. Regalado <SRegalado@ag.nv.gov>

Sent: Monday, December 27, 2021 3:28:32 PM

To: Mitchell Bisson <mbisson@bissonlegal.com>

Cc: Christopher M. Guy <cguy@ag.nv.gov>

Subject: FW: Bai v. Reubart, et al.- USDC 2:19-cv-00739-GMN-NJK

Mr. Bisson,

DAG Guy is in agreement with the attached Stip and Order and gives you permission to file with his electronic signature.

Thank you,

Sheri Regalado

Legal Secretary II

Office of the Attorney General

Public Safety Division-NDOC

555 E. Washington Avenue, Suite 3900

Las Vegas, NV 89101

Phone: 702-486-9833

Fax: 702-486-3773

sregalado@ag.nv.gov



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